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P56952**REMARKS**

This Amendment is in response to the Office action (Paper No. 20080513) mailed on 30 June 2008. Re-examination and reconsideration are respectfully requested.

**Listing of The Claims**

Pursuant to 37 CFR §121(c), the claim listing, including the text of the claims, will serve to replace all prior versions of the claims, in the application.

**Status of The Claims**

Claims 1, 3, 4 and 6-19 are pending in the application.

**Amendment of The Claims**

Claims 1, 3, 4, and 6-19 are amended and claims 2 and 5 are cancelled in response to the Examiner's rejection.

**Issues Raised by Paper No. 20080513****Specification**

Specification is objected to because of informalities.

The Examiner pointed out that "Nia" should be amended to "Via" in paragraph [0059]. The applicant has amended paragraph [0059] in accordance with the Examiner's suggestion.

The Examiner objects the abstract of the disclosure because the term "VOIP" should be

PATENT  
P56952

spelled out to provide a clear understanding of the terminology. The applicant has amended the abstract as requested by the Examiner.

### **Drawings**

The drawings are objected to under 37 CFR 1.83(a). The drawings must show every feature of the invention specified in the claims.

The applicant has amended FIGS. 2 and 3 for showing every feature of the claimed invention. In FIGS. 2 and 3, the indicators of "Local network" and "Public Network" are added.

In the amended FIGS. 2 and 3, reference number 100 refers to calling terminal, public network refers to the claimed network disposed outside of the private NAT network, reference 200 refers to NAT block, reference numbers 310, 320 and 330 refer to a plurality of call agents disposed within the NAT network, NAT private network refers to the claimed Private NAT network.

### **Claim Rejections – 35 U.S.C. §101**

Claims 1-6 and 19 are rejected under 35 U.S.C. §101 because limitations recite non-statutory subject matter.

The applicant has amended claims 1 and 4 and paragraphs [0029] and [0064] in order to overcome the Examiner's rejections to claims 1-6 and 19 under 35 U.S.C. §101.

### **Claim Rejections – 35 U.S.C. 103**

I. Claims 1-6 are rejected under 35 U.S.C. §103 as being unpatentable over Kim (US

PATENT  
P56952

2004/0139230).

The Examiner rejected claims 1 through 6 under 35 U.S.C. §103 as being unpatentable over Kim (US 2004/0139230) by asserting that the applicant's inventions defined in claims 1 through 6 are known to a person with ordinary skill in the art by combining the known knowledge and Kim '230's invention.

The applicant noticed that the Examiner uses Kim '230 to reject your client's claims under 35 U.S.C.103(a) and the U.S. filing date of Kim '230 is December 23, 2003 which is later than your client's foreign priority date, February 14, 2003. It is clearly stated in MPEP 706.02(I) that:

“Absent proper evidence of disqualification, the appropriate rejection under 35 U.S.C. 103(a) with applying prior art under 35 U.S.C. 102(e), (f), or (g) should be made.”

Therefore, the applicant respectfully simultaneously submitted an English translation of the earlier filed Korean patent dated 14 February 2003 and there duly assigned Serial No. 2003-9512 along with a certificate of translation in order to remove Kim '230 as prior art.

Even though Kim '230 may be properly removed as prior art by submitting an English translation of the earlier filed Korean patent Serial No. 2003-9512 along with a certificate of translation, the applicant will still provide the following arguments to show the patentability of your client's invention over the similar techniques as shown in Kim '230.

Claims 1-4 and 6 have been amended for a better showing of the patentability of the

PATENT  
P56952

applicant's inventions. The definition of "translating a public address to a private address" disclosed in original claim 2 is added to the amended claim 1, and claim 5 has been cancelled and the definitions defined by the original claim 5 has been added to the amended claim 4. Since the definitions amended have existed in the original claims, no new ground is introduced in this amendment.

The Examiner is respectfully invited to note that Kim '230 merely one of related art of the applicant's invention and does not teach multiple call agents existing in a NAT (network address translation) private network. On the other hand, Kim '230 explicitly shows in FIGS. 1 through 3 that only one call agent is used in one NAT network.

The applicant's invention however expressly defines multiple call agents in a NAT private network in order to simultaneously receive a large amount of SIP calls.

Therefore, the applicant's inventions defined in claims 1 through 6 are NOT known to a person with ordinary skill in the art by combining the known knowledge and Kim '230's invention.

The applicant, as previously mentioned, has amended the independent claims 1 and 4 in order to define a private network address translation (NAT) network having a plurality of call agents and a NAT block translating the addresses transmitted between an external call terminal and the private NAT network. The amended claims 1 and 4 include definitions disclosed in original claim 7, therefore, no new ground is introduced in this amendment.

Since the amended independent claims 1 and 4 have similar definitions as defined in claims 7, 13 and 19, the applicant will discuss the distinguish between the Examiner proposed combinations and the applicant's invention as defined in claims 1, 4, 7, 13 and 19 in the following section.

PATENT  
P56952

II. Claims 7-19 are rejected under 35 U.S.C. §103 as being unpatentable over Kim '230, and further in view of MeLampy (US 7,133,923).

The Examiner rejected claims 7 through 19 under 35 U.S.C. §103 as being unpatentable over Kim '230, and further in view of MeLampy (US 7,133,923) by asserting that the applicant's inventions have been obvious to a person of ordinary skill in the art to incorporate the teaching of Melampy '923 and Kim '230. The applicant respectfully disagrees and traverse with the Examiner's assertion for the following reasons.

Claims 1, 4, 7, 13 and 19

Claims 7 through 19 have been amended for a better showing of the patentability of the applicant's inventions. Since the definitions amended have existed in the original claims, no new ground is introduced in this amendment.

The applicants' amended claims 1, 7 and 19 define the invention shown in the applicant's FIG. 2 and the amended claims 4 and 13 define the invention shown in the applicant's FIG. 3. FIG. 2 and FIG. 3 teach two related methods of SIP data communication. FIG. 2 shows a SIP data communication initiated from an external public network disposed outside of the private NAT network and terminated at one of the plurality of call agents disposed inside of the private NAT network; and FIG. 3 shows a SIP data communication initiated from one of the plurality of call agents disposed inside of the private NAT network and terminated at an external public network disposed outside of the private NAT network. Even though the these two inventions for the SIP data communication are two converse procedures, the definitions and principles are similar. Therefore

PATENT  
P56952

the applicant's amended claims, 1, 4, 7, 13 and 19 has similar definitions. The applicant in the following paragraphs will discuss the distinguish between the Examiner's proposed combination and the invention defined in the applicant's amended claim 7 as an example.

**Firstly**, Kim '230 does not teach multiple call agents existing in a NAT (network address translation) private network. On the other hand, Kim '230 explicitly shows in FIGS. 1 through 3 that only one call agent is used in one NAT network.

On the other hand, the applicant in paragraphs [0010] and [0011] and FIGS. 2 and 3 expressly defines multiple call agents in a NAT private network in order to simultaneously receive a large amount of SIP calls.

Therefore, Kim '230 merely teaches one of the related art of the applicant's invention as discussed in paragraphs [0009] through [0010] of the applicant's invention.

**Secondly**, Kim '230 defines SIP proxy 320 disposed inside of a NAT network, and SIP proxy 320 receives an "INVITE" message from user agent 310 with SIP proxy 320 and user agent 310 being disposed within the same NAT network 300. Kim '230 defines RTP relay 350 disposed outside of NAT network 300, and RTP relay 350 creates and stores IP address and port pairs upon SIP proxy 320 receives the "INVITE" message. (See paragraph [0055]) Kim '230's SIP proxy 320 has assigned static IP addresses stored in a table as shown in FIG. 2. Therefore, Kim '230's SIP proxy 320 performs a reception of a call establishment request message, Kim '230's RTP relay 350 creates a session upon SIP proxy 320 receives the INVITE message and RTP relay 350 is disposed

PATENT  
P56952

outside of NAT network 300, and Kim '230's SIP proxy 320 has assigned static IP addresses registered in the table. (See steps S301 and S303 in Kim '230's FIG.3)

On the other hand, the applicant's invention defines a private network address translation network having NAT block 200, and NAT block 200 receives the call establishment request (INVITE message) from calling SIP terminal 100 connected to an external public network, and NAT block 200 extracts a public network address of the received call establishment request message, stores the extracted public network address, selects a specific call agent among a plurality of call agents disposed within the NAT network, and stores a communication path for the specific call agent in session information of the relevant call. (See steps 401 and 402 in the applicant's FIG. 2). The applicant in paragraph [0013] expressly states that the applicant's NAT system allows "the Internet being accessed at a node where an individual address is not assigned".

Therefore, not only the applicant's private NAT network having NAT block 200 performs has more comprehensive functions compared to Kim '230's NAT network, but also the applicant's system has more flexibility compared to Kim '230 by realizing an Internet being accessed at a node where an individual address is not assigned.

**Thirdly**, the Examiner further asserts that MeLampy '923 teaches a selection of call agent among multiple call agents.

The applicant submits that MeLampy '923 in lines 22 through 33 of column 14 suggests a function of selecting a call agent among multiple call agents and each of the multiple call agents separately disposed in different network domains. MeLampy '923 in FIG. 1, expressly shows

PATENT  
P56952

MeLampy '923's invention is related to multiple domain network 100 which is composed of two separate Internet telephone administration domains 102 and 104. (See line 9-10 and 22-24 of column 8) That is, in each Internet telephone administration domain, only ONE call agent (either call agent 202 or call agent 204) exists. Further, in FIG. 14, MeLampy '923 shows two session router 2406 and 2408 disposed between call agents 2402 and 2404. Since session router is a connection between two different network domains as shown in FIG. 1, call agents 2402 and 2404 are NOT disposed within one network. Therefore, MeLampy '923 is merely a related art as discussed in paragraphs [0009] through [0010] of the applicant's invention and is silent about a call agent selection between multiple call agents disposed within one NAT network.

The applicant amended claim 7 in order to show the definition of multiple call agents within one NAT private network. The Examiner is invited to consider that the applicant's selection of call agents are performed by a step of a specific call agent among multiple call agents which are disposed within one network address translation private network.

Therefore, MeLampy '923 is silent about a call agent selection between multiple call agents disposed within one NAT network.

**Fourthly**, the Examiner further states that Melampy '923 in lines 26 through 28 of column 14 suggests distributing traffic by transmitting a session initiation protocol message transmitted from the calling terminal to a selected call agent only. The Examiner is respectfully asked to ponder that Melampy '923's lack of definition of multiple call agents existing in one SINGLE NAT network. Therefore, even though Melampy '923 teaches a step of selecting call agents, Melampy '923 merely



PATENT  
P56952

teaches a step of selecting call agents and each of the call agents distributed in separate network domains. (See Melampy '923's FIG. 1)

Therefore, Melampy '923 is silent about a step of distributing traffic by transmitting a session initiation protocol message transmitted from the calling terminal to a selected call agent only.

Therefore, neither of Kim '230 and Melampy '923 teaches or suggests an employment of multiple call agents within one single network domain and thus not provides the applicant's system and method as defined in claim 7 for:

“receiving, at a network address translation block disposed within a network address translation (NAT) network and provided between [[the]] a calling terminal connected to a network disposed outside of the NAT network and a plurality of call agents disposed within the NAT network for sending a first call from the calling terminal to the NAT network, a call establishment request message generated from the calling terminal ~~connected to an external network~~, extracting a public network address from the received call establishment request message, and storing the extracted public network address;

selecting ~~a specific a first~~ call agent among ~~[[a]]~~ the plurality of the call agents, storing a communication path for the first selected specific call agent in session information of a relevant call; and

PATENT  
P56952

distributing traffic by transmitting a session initiation protocol message transmitted from the calling terminal, to [[a]] the first selected call agent only, using information stored in a session of the relevant call.”

Therefore, considering the above stated discussions, the Examiner’s combination is ill founded and thus not proper.

The same arguments are applied to be against the Examiner’s rejections to claims 1, 4, 13 and 19. Therefore, the Examiner is respectfully requested to reconsider the applicant’s amended claims 1, 4, 7, 13 and 19.

Claims 2-3, 6, 8-12 and 14-18

Claim 5 has been cancelled and the definition defined in the original claim 5 is added into the amended claim 4. Since the definitions amended have existed in the original claims, no new ground is introduced in this amendment.

The applicant notes that the examiner’s proposed combination does not contemplate an employment of multiple call agents within one single network domain. Consequently, claims 2-3, 6, 8-12 and 14-18 are not tendered obvious the Examiner’s proposed combination of Kim ‘ 230 and McLampy ‘923.

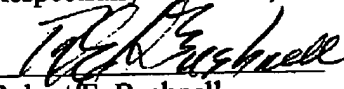
PATENT  
P56952

Therefore, the Examiner is respectfully requested to reconsider the applicant's claims 2-3, 6, 8-12 and 14-18.

In view of the foregoing amendments and remarks, all claims are deemed to be allowable and this application is believed to be in condition to be passed to issue. If there are any questions, the examiner is asked to contact the applicant's attorney.

No fee is incurred by this Amendment.

Respectfully submitted,

  
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